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**LATHAM & WATKINS**

**EX PARTE OR LATE FILED**

PAUL R. WATKINS (1899-1973)  
DANA LATHAM (1898-1974)

ATTORNEYS AT LAW  
1001 PENNSYLVANIA AVE., N.W., SUITE 1300  
WASHINGTON, D.C. 20004-2505  
TELEPHONE (202) 637-2200  
FAX (202) 637-2201  
TLX 590775  
ELN 62793269

**NEW JERSEY OFFICE**  
ONE NEWARK CENTER  
NEWARK, NEW JERSEY 07101-3174  
TELEPHONE (201) 639-1234  
FAX (201) 639-7298

**CHICAGO OFFICE**  
SEARS TOWER, SUITE 5800  
CHICAGO, ILLINOIS 60606  
TELEPHONE (312) 876-7700  
FAX (312) 993-9767

**LONDON OFFICE**  
ONE ANGEL COURT  
LONDON EC2R 7HJ ENGLAND  
TELEPHONE + 44-71-374 4444  
FAX + 44-71-374 4460

**LOS ANGELES OFFICE**  
633 WEST FIFTH STREET, SUITE 4000  
LOS ANGELES, CALIFORNIA 90071-2007  
TELEPHONE (213) 485-1234  
FAX (213) 891-8763

**MOSCOW OFFICE**  
113/1 LENINSKY PROSPECT, SUITE C200  
MOSCOW 117198 RUSSIA  
TELEPHONE + 7-503 956-5555  
FAX + 7-503 956-5556

**NEW YORK OFFICE**  
885 THIRD AVENUE, SUITE 1000  
NEW YORK, NEW YORK 10022-4802  
TELEPHONE (212) 906-1200  
FAX (212) 751-4864

**ORANGE COUNTY OFFICE**  
650 TOWN CENTER DRIVE, SUITE 2000  
COSTA MESA, CALIFORNIA 92626-1925  
TELEPHONE (714) 540-1235  
FAX (714) 755-8290

**SAN DIEGO OFFICE**  
701 "B" STREET, SUITE 2100  
SAN DIEGO, CALIFORNIA 92101-8197  
TELEPHONE (619) 236-1234  
FAX (619) 696-7419

**SAN FRANCISCO OFFICE**  
505 MONTGOMERY STREET, SUITE 1900  
SAN FRANCISCO, CALIFORNIA 94111-2562  
TELEPHONE (415) 391-0600  
FAX (415) 395-8095

June 8, 1995

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Re: CC Docket No. 92-297, RM-7872, RM-7722  
IC Docket No. 94-31  
Ex Parte Presentation

Dear Mr. Caton:

Representatives of Hughes Communications Galaxy, Inc. ("Hughes") met this morning with Donald Gips and Gregory Rosston of the Office of Plans and Policy to discuss matters related to the Commission's pending proceedings in CC Docket No. 92-297 and IT Docket No. 94-31. The Hughes representatives were Edward J. Fitzpatrick of Hughes and the undersigned, counsel for Hughes. The enclosed materials formed the basis for the discussions.

An original and two copies of this letter are enclosed. Copies of this letter are being provided simultaneously to the Commission representatives identified above.

Respectfully submitted,

John P. Janka

Enclosures

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**HUGHES**

# **Presentation to the Federal Communications Commission**

## **28 GHz Solutions**

**Hughes Communications Galaxy, Inc.**

**June 8, 1995**

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FEDERAL COMMUNICATIONS COMMISSION

## **KA BAND IS THE NEXT AVAILABLE LOCATION FOR NEW SATELLITE SERVICES**

- **Access to the Ka band is essential for the delivery of interactive, wideband satellite services**
  - **other bands are congested**
  - **allows use of small (26 inch) dishes**
  - **provides sufficient bandwidth for tomorrow's spectrum intensive applications**
- **Telecommunications providers around the world are eager to utilize Ka band satellites to deploy broadband service**
  - **allows rapid build out of infrastructure**
  - **satellites provide distance insensitive service**
  - **facilitates development of GII**

## **CURRENT DOMESTIC KA BAND PROCEEDING REQUIRES PROMPT RESOLUTION**

- **Hughes is committed to finding a solution to the current domestic impasse at Ka band**
- **Industry proposed domestic band split has broad support**
  - **LMDS (Texas Instruments)**
  - **Computer industry (Hewlett Packard)**
  - **GSO FSS (Hughes)**
  - **non-GSO FSS (Teledesic)**
  - **Spacecraft manufacturers and launch providers (Boeing and Lockheed Martin)**

## **CURRENT DOMESTIC KA BAND PROCEEDING REQUIRES PROMPT RESOLUTION (cont.)**

- **Industry proposed domestic band split serves multiple interests**
  - **provides sufficient spectrum for all pending domestic applications: LMDS, MSS feeder links, non-GSO FSS and GSO FSS**
  - **facilitates development of broadband two-way LMDS service**
  - **implements conclusions of 28 GHz Neg Reg**
    - **non-GSO MSS and LMDS can share**
    - **GSO FSS and LMDS cannot share**
    - **MSS feeder links who will not share with LMDS can be accommodated on a reverse band basis in other bands**

## **CURRENT DOMESTIC KA BAND PROCEEDING REQUIRES PROMPT RESOLUTION**

- **Commission's proposed band split hinges on GSO FSS and non-GSO MSS feeder link sharing**
  - **parties recognize that sharing is technically possible if non-GSO system implement certain operational techniques**
  - **non-GSO MSS proponents do not believe these sharing techniques are economically feasible**
  - **MSS feeder links who cannot share under these terms should be accommodated on a reverse band basis elsewhere**
- **Domestic licensing solution should not limit use of spectrum internationally**

## **CONCLUSION**

- **Commission should promptly commence domestic licensing at Ka band**